

Before the  
Federal Communications Commission  
Washington DC 20554

In the Matter of

1998 Biennial Regulatory Review --  
Amendment of Part 97 of the Commission's  
Amateur Service Rules.

WT Docket No. 98-143

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COMMENTS

I. INTRODUCTION

1. In the interest of saving the Commission's time and resources, these comments address only three issues raised by the Commission's Notice of Proposed Rulemaking (Notice). Writer apologizes for filing on paper only, lacking the desired electronic and magnetic media capability.

II. EXECUTIVE SUMMARY

2. In these Comments, writer includes issues by their subject in the Notice. For reasons developed in Discussion section, writer urges several decisions.

- o Preserve useful power limitations on all classes of operators in "Novice" segments on 80, 40, 15, and 10 meter bands.
- o Preserve respectable standards for radio operating proficiency including Morse code at present levels.
- o Raise written examination to high professional standards, but offer the existing twenty word per minute code element as an alternative.

III. BACKGROUND

3. The Amateur Radio Service rules are designed to provide emergency communications, advance radio technology, improve operator skills, enhance international goodwill, and expand the number of trained operators, technicians and electronic experts.

IV. DISCUSSION

A. License Classes

4. In the last four lines of paragraph 12, a question is raised about Novice frequencies and power limitations. Even if the Commission should delete the frequency limitations on Novices, please preserve band segments with power limitations on all classes of operators. The "Novice" segments have proven to be among the most popular in the Amateur bands. This useful haven for lower powered stations attracts all license classes. Over the past several years this writer has found Advanced and Extra class operators there slowing down and encouraging the less experienced.

5. Many operators lack the means to assemble a station capable of maximum legal power. Some find it easier to use the minimum power necessary to communicate where interference is reduced. We have parks with trails where motorized vehicles are prohibited. We need band segments favoring polite restraint and operating skill. By maintaining them, the Commission promotes responsible, considerate operating.

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## E. Telegraphy Examination Requirements

6. In the early days of Amateur radio, testing for knowledge of Morse code was a practical necessity. Today, radiotelegraphy is but one of many diverse modes accessible to competent licensees. And so today's question pools test applicants in a variety of areas. A letter to QST (March 1997, page 24, "The Best Filter") disclosed a shortcoming that needs to be addressed:

7. Reliance solely on stiff technical examinations favors engineers and technicians, selectively eliminating the young and others less technically inclined. This seems unfair and socially unacceptable. There is a better way. The letter suggests a "filter" related to Amateur HF operating. It requires only modest effort by virtually anyone not mentally handicapped. It does not discriminate on the basis of age, gender, ethnicity, level of formal education, or technical background. Please retain Morse testing as a meaningful part of licensing requirements.

8. The ARRL survey shows a majority see the necessity of Morse testing. This writer held 13 wpm privileges for over three decades. Lowering the upgrade standard was out of the question. Without a challenge, an upgrade is not an upgrade. Professional educator Dr G. R. Wheeler has developed CodeQuick. Such major advances in learning Morse code were unheard of thirty-five years ago. The three existing levels of 5, 13, and 20 wpm are still appropriate. By retaining them, the Commission continues encouraging the useful underlying trait of discipline.

## F. Written Examinations

9. Any examination sets a standard. Effective examinations pass some and fail others. So complaints are likely to continue. When raising written examination difficulty, please offer applicants the 20 wpm code test as an optional substitute for a missed written element. The code test is already in place. It imposes no additional workload. It can help the Commission deflect complaints and encourage those who expected an easier written test to rethink their alternatives.

## V. CONCLUSION

10. In these Comments, writer has considered three issues from the Notice. From reasons developed above, writer urges these decisions:

- o Preserve useful power limitations on all classes of operators in "Novice" segments on 80, 40, 15, and 10 meter bands.
- o Preserve respectable standards for radio operating proficiency including Morse code at present levels.
- o Raise written examination to high professional standards, but offer the existing twenty word per minute code element as an alternative.

Respectfully submitted,

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